

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Jane Doe, by and through her guardians,
Gregory and Michelle Johnson, Gregory
Johnson, Michelle Johnson, and John and
Jane Does # 1-10,

Plaintiff,

v.

South Carolina Department of Social
Services (SCDSS),
Kameron Seth Cox; Tista M. Flesch-10,
Healthy Minds, LLC, Debby Thompson and
John and Jane Roes # 1-10

Defendants.

Jane Doe, by and through her guardians,
Gregory and Michelle Johnson, Gregory
Johnson, Michelle Johnson, and John and
Jane Does # 1-10,

Plaintiff,

v.

South Carolina Department of Social
Services (SCDSS),
Kameron Seth Cox; Tista M. Flesch-10,
Healthy Minds, LLC, Debby Thompson and
John and Jane Roes # 1-10

Defendants.

**CIVIL ACTION NO. 3:06-3663-JFA
3:07-1629-JFA**

**MOTION TO DISMISS
DEFENDANT KAMERON SETH COX**

TO: ROBERT J. BUTCHER, ESQUIRE, ATTORNEY FOR PLAINTIFFS HEREIN:

YOU WILL PLEASE TAKE NOTICE that the undersigned attorney for Defendant
Kameron Seth Cox will move before the Presiding Judge of the United States District Court for

the District of South Carolina, Columbia Division, at such time and place as may be set by the Court, for an Order, pursuant to Rule 12, FRCP, granting dismissal to Defendant Kameron Seth Cox.

This motion is based on the ground that Defendant Kameron Seth Cox is the only remaining Defendant and any judgment against him would be unenforceable since Plaintiffs and he executed a Covenant not to Execute on January 7, 2008 and January 15, 2008, respectively.

Defendant Cox's motion is based upon the pleadings filed in this action; the Covenant not to Execute; and such other matters as may be properly presented to the Court at the time of any hearing.

Bernstein and Bernstein, LLC

By: s// Beth E. Bernstein
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Dated: September 29, 2008